

Craig S. Summers (Bar No. 108,688)
csummers@kmob.com
Amy C. Christensen (Bar No. 204,052)
achristensen@kmob.com
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street
Fourteenth Floor
Irvine, CA 92614
Phone: (949) 760-0404
Facsimile: (949) 760-9502

Attorneys for Defendant,
PARIS BLUES, INC.

Gregory S. Gilchrist (Bar No. 111,536)
gsgilchrist@townsend.com
TOWNSEND AND TOWNSEND AND CREW LLP
Two Embarcadero Center, 8th Floor
San Francisco, CA 94111
Phone: (415) 576-0200
Facsimile: (415) 576-0300

Attorneys for Plaintiff,
LEVI STRAUSS & CO.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

E-FILED - 2/6/07

LEVI STRAUSS & CO.,

Plaintiff,

v.

PARIS BLUES, INC.,

Defendant.

AND RELATED COUNTERCLAIMS

Civil Action No.: C 06-04505 RMW

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO
EXTEND THE DEADLINE TO
COMPLETE MEDIATION**

1 WHEREAS, Plaintiff Levi Strauss & Company ("Plaintiff") filed its Complaint for
2 Trademark Infringement and Dilution and Unfair Competition against Defendant Paris Blues,
3 Inc. ("Defendant") on July 24, 2006;

4 WHEREAS, the Court issued an Minute Order, on November 3, 2006, setting the
5 deadline to complete mediation within 90 days of the date of the order (i.e., by February 1,
6 2007);

7 WHEREAS, the parties have been engaged in substantive settlement discussions since the
8 filing of the Complaint;

9 WHEREAS, the parties have cooperated and worked to schedule a mediation for this case
10 on January 23, 2007;

11 WHEREAS, due to the on-going settlement negotiations, the parties' proposed settlement
12 terms are very close;

13 WHEREAS, the parties are hopeful a settlement can be reached in the upcoming week or
14 shortly thereafter;

15 WHEREAS, in light of the progress of the settlement discussions, the parties would like
16 to avoid unnecessary mediation costs and postpone the mediation; and

17 WHEREAS, the mediator has approved the rescheduling of the mediation;

18 NOW THEREFORE, the parties submit this stipulated request, through their respective
19 counsel of record, requesting that this Court issue an order extending the deadline to complete
20 mediation to February 28, 2007 or as soon thereafter as the Court deems appropriate.

21 The only previous time modifications in this case were the October 4, 2006 order
22 extending the case management dates and the stipulation extending the time to respond to the
23 Complaint.

1 Due to the early stage of this case, the parties do not believe that the requested time
2 modification would have any effect on the schedule for the case.

3 Respectfully submitted,

4 KNOBBE, MARTENS, OLSON & BEAR, LLP

5
6 Dated: January 19, 2007

By: /s/ Amy C. Christensen
Craig S. Summers
Amy C. Christensen

8 Attorneys for Defendant,
9 PARIS BLUES, INC.

10 TOWNSEND AND TOWNSEND AND CREW, LLP

11 Dated: January 19, 2007

By: /s/ Gregory S. Gilchrist
Gregory S. Gilchrist
(Amy C. Christensen attests that counsel for Plaintiff
13 concurs in the filing of this document.)

14 Attorneys for Plaintiff,
15 LEVI STRAUSS & COMPANY

16 **~~PROPOSED~~ ORDER**

17 The deadline to complete mediation is extended to February 28, 2007.

18
19 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

20
21 Dated: 2/6/07

Ronald M. Whyte
22 Honorable Ronald M. Whyte
UNITED STATES DISTRICT COURT JUDGE

23 3328694